



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL CLEANUP

May 22, 2013

Mr. Bob Wyatt
NW Natural
220 NW 2nd Avenue
Portland OR 97209

sent via email only

Mr. Myron Burr
Siltronic Corporation
7200 NW Front Avenue, M/S 20
Portland, Oregon 97210-3676

RE: Supplemental Investigation Work Plan at U.S. Moorings Site
Gasco Sediments Site

Dear Sirs:

EPA reviewed the May 15, 2013 letter submitted by NW Natural regarding NW Natural's evaluation of the U.S. Moorings offshore area. While the letter discusses several lines of evidence focusing on the U.S. Moorings offshore area and highlights some of the potential administrative challenges if this area is included within the Gasco Sediments Site Project Area, no new data was presented that refutes the substantial product evaluation submitted by EPA to NW Natural on November 29, 2012.

As stated in the May 1, 2013 EPA letter to NW Natural and Siltronic, EPA considers the presence of substantial product to be a strong line of evidence for potentially including an area in the Gasco Sediments Site Project Area. The Gasco Sediments Site 2009 Administrative Settlement Agreement and Order on Consent for Removal Action (AOC) Statement of Work (SOW) indicates that the remedial action "will include a preference for removal of in-river materials containing 'substantial product'..." and as such, identification of substantial product is one of several lines of evidence critical to the evaluation of remedial action alternatives.

As stated in the November 29, 2012 EPA letter, NW Natural has two options: 1) accept the findings of EPA's substantial product evaluation and incorporate this information into the Gasco Engineering Evaluation/Cost Estimate (EE/CA), or 2) conduct additional sampling to verify the presence of substantial product. If NW Natural does not agree with the substantial product evaluation, then a work plan detailing additional sampling in the U.S. Moorings offshore area should be submitted per the agreed to schedule (i.e., within 90 days of May 10, 2013).

Please let me know if you have any questions or concerns at (206) 553-1220 or via email at sheldrake.sean@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'SS' followed by a long horizontal stroke.

Sean Sheldrake, RPM

Cc:

Kristine Koch, EPA
Chip Humphrey, EPA
Mark Ader, EPA
Dana Bayuk, ODEQ

via email only